

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**RESERVATION OF RIGHTS OF ASSURED GUARANTY CORP, ASSURED
GUARANTY MUNICIPAL CORP., AND NATIONAL PUBLIC FINANCE
GUARANTEE CORPORATION WITH RESPECT TO THE RENEWED MOTION OF
OFFICIAL COMMITTEE OF UNSECURED CREDITORS PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE 3013 FOR ENTRY OF ORDER
RECLASSIFYING CLASS 48A AND CLASS 55 CLAIMS UNDER OVERSIGHT
BOARD'S PLAN OF ADJUSTMENT DATED MARCH 8, 2021 (ECF NO. 16396)**

Assured Guaranty Corp. ("AGC"), Assured Guaranty Municipal Corp. ("AGM,"
and together with AGC, "Assured"), and National Public Finance Guarantee Corporation
("National") hereby submit this reservation of rights (the "Reservation of Rights") with respect to
the *Renewed Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of*

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Bankruptcy Procedure 3013 for Entry of Order Reclassifying Class 48A and Class 55 Claims Under Oversight Board's Plan of Adjustment Dated March 8, 2021 (ECF No. 16396, the "Motion")² and respectfully state as follows:

RESERVATION OF RIGHTS

1. On April 13, 2021, the Official Committee of Unsecured Creditors filed the Motion.
2. On April 14, 2021, this Honorable Court ordered that responsive papers to the Motion must be filed by April 20, 2021, at 5:00 p.m. (AST). (ECF No. 16408).
3. Assured and National hereby reserve all of their rights with respect to the Motion, including (i) their right to file a response to the Motion at a later time, (ii) their right to join in responses to the Motion filed by other parties, (iii) their right to be heard at any hearing on the Motion, and (iv) their right to be heard with respect to classification issues at another time, including under any relevant schedule entered by the Court.

[Remainder of Page Intentionally Omitted]

² Unless otherwise indicated, ECF numbers referenced in this Reservation of Rights refer to the docket in Case Number 17-3283-LTS.

Dated: April 20, 2021
New York, New York

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, the 20th day of April, 2021.

By: /s/ Howard R. Hawkins, Jr.
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